- WA state has mandated 70% efficiency, mass walls cannot be given a break and then put the burden on wood and steel to make up the difference to meet the 70%. Wood and steel already have higher requirements than the IECC baseline.
- National codes have already vetted this issue with all proprietary arguments being made, WA state cannot give a free pass to a specific individual building material, that is not the scope of the SBCC.
- This isn't just a masonry issue, wood and steel contractors have equally lost jobs and reduced in size.
- WA state is not just a masonry state, wood products are a huge contributor to this state's economy.
- The prescriptive tables are not the appropriate place to ask for relief in the codes for a product, all products and systems should be treated equally. If the masonry industry wants to reduce the energy requirements for their wall system, the need to do this through the performance path where they can offer solutions to make up for the difference of what their system looses.
- The Council needs to ask the proponent where exactly they propose to make up for the requested loss.
- I ask the Council to reject E-99 and E100 and accept the Energy TAG's proposal.
- If the Council is inclined to accept E-99 and E-100, I would ask that they also make a modification to the wood and steel framing systems to the degree that it brings parity back to all systems in the prescriptive approach.

RESIDENTIAL			2006			20	009		2012 (Proposed)				
	Zone 1		Zone	Zone 2		Zone 1		Zone 2		Zone 1 (5/M4)		Zone 2 (6)	
	U	R	U	R	U	R	U	R	U	R	U	R	
Table R5-1 Target Component Values Group R Occupancy Space Heat Elect.	.057	21	.044	19A+5									
Table R5-1 Target Component Values Single Fam Res.					.056		.056						
Table 6-1 Prescriptive Group R Glaz. 10% Glaz. 12%		15		21int	St.								
Glaz. 15% Glaz. 17% (R1/R2)Glaz. 25% (R3/R4) Unlimited (R1/R2) Unlimited	.057	21 21 21 21 21	.054	19+5 19+5 21int 19+5 21int									
Table 6-1 Prescriptive Single Family Res. Glaz. 12% Glaz. 13% Glaz. 25% Unlimited						21int 21int 21int		21int 19+5 19+5					
Table R402.1.1 component- wood Table R402.1.1 component- mass									.056	21int 21/21	.044	21+5	

Description	2006				2009				2012 (Proposed)				
Description													
Commercial		Zone 1		Zone 2		Zone 1		Zone 2		Zone 1 (5/M4)		Zone 2 (6)	
Prescriptive Table	U	R	U	R	U	R	υ	R	U	R	U	R	
ABOVE GRADE WALLS							•						
(mass)													
Elec. Heat	<u>.150*</u>	<u>5.7*</u>	<u>.123*</u>	<u>7.6*</u>	.150	5.7	.123	7.6	.078	11.4ci	.078	13.3ci	
Other Heat	.150*	<u>5.7*</u>	<u>.123*</u>	<u>7.6*</u>	N/A	N/A	N/A	N/A					
(metal)					100								
Elec. Heat			1	13+		13+		13+	.055	10ci	.049	12.5ci	
Other Heat	.109	19	.084	3.8	.064	7.5	.064	7.5					
(wood)					, ĝ								
Elec. Heat	.062	19	.044	24	.057	21	.051	21+	.054	21int	.051	20+3.8	
Other Heat	.062	19	.062	19	N/A	N/A	N/A	2.5					
								N/A					
Opt. 2) = $E-99/E100$													
Mass													
						}			.104	<u>9.5ci</u>	<u>.078</u>	11.4ci	
Metal													
	s								.055	10ci	.049	12.5ci	
Wood												100	
									.054	21int	.051	20+3.8	

^{* 2.} Concrete and Masonry Walls: If the area weighted heat capacity of the total opaque above grade wall is a minimum of 9.0 Btu/ft² • °F, then:

a) The area weighted average <u>U-factor may be increased to U-0.15 maximum</u>, or a minimum additional R-5.7 continuous insulation uninterrupted by framing; or

b) The wall may be ASTM C90 concrete block walls, ungrouted or partially grouted at 32 in. or less on center vertically and 48 in. or less on center horizontally, with ungrouted cores filled with material having a maximum thermal conductivity of 0.44 Btu-in/h•ft •°F.

⁻⁻ Individual walls with heat capacities less than 9.0 Btu/ft² •°F and below grade walls shall meet opaque wall requirements listed above.

⁻ Glazing shall comply with the glazing requirements listed above.